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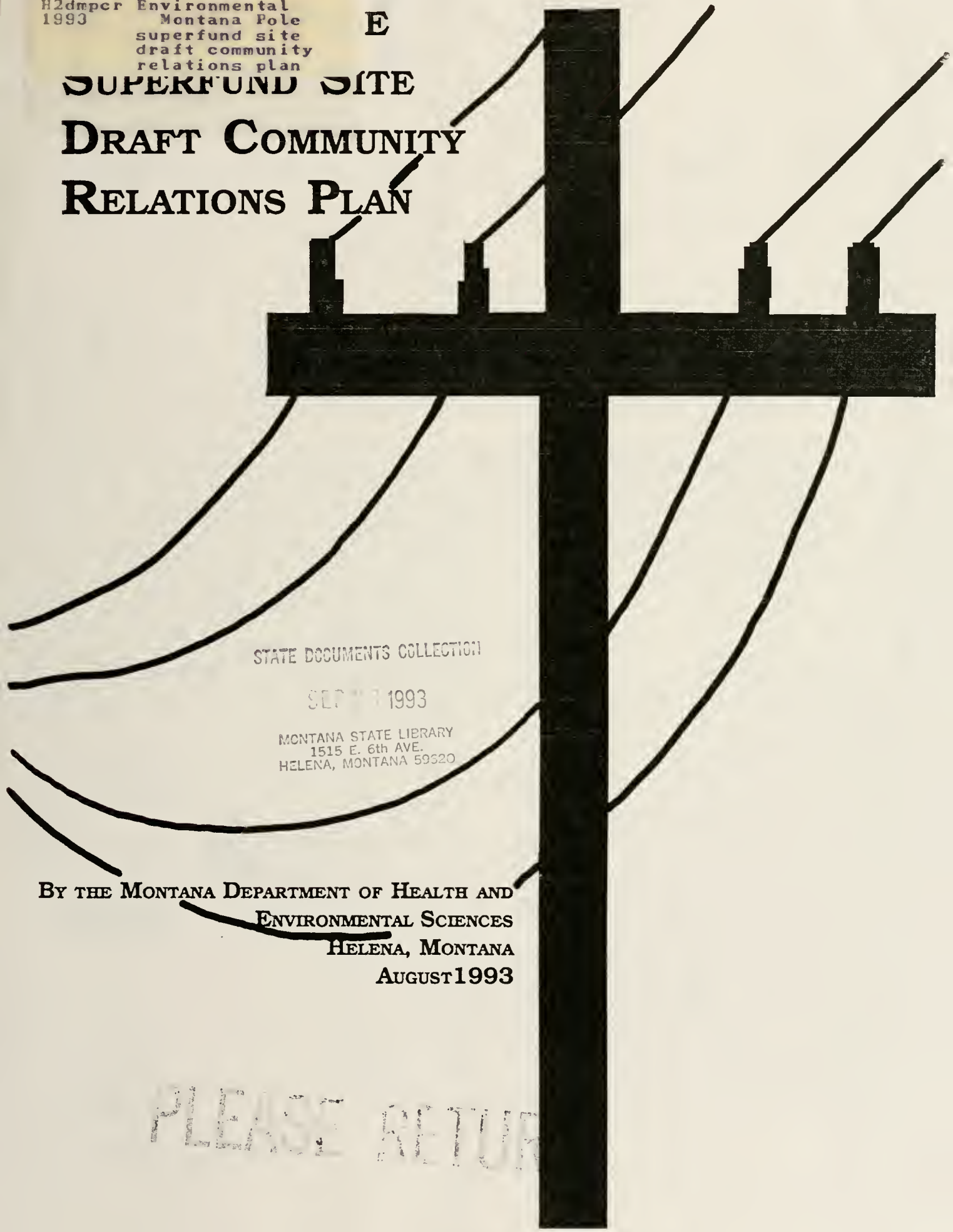

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Figure 1:
Montana Pole Superfund Site
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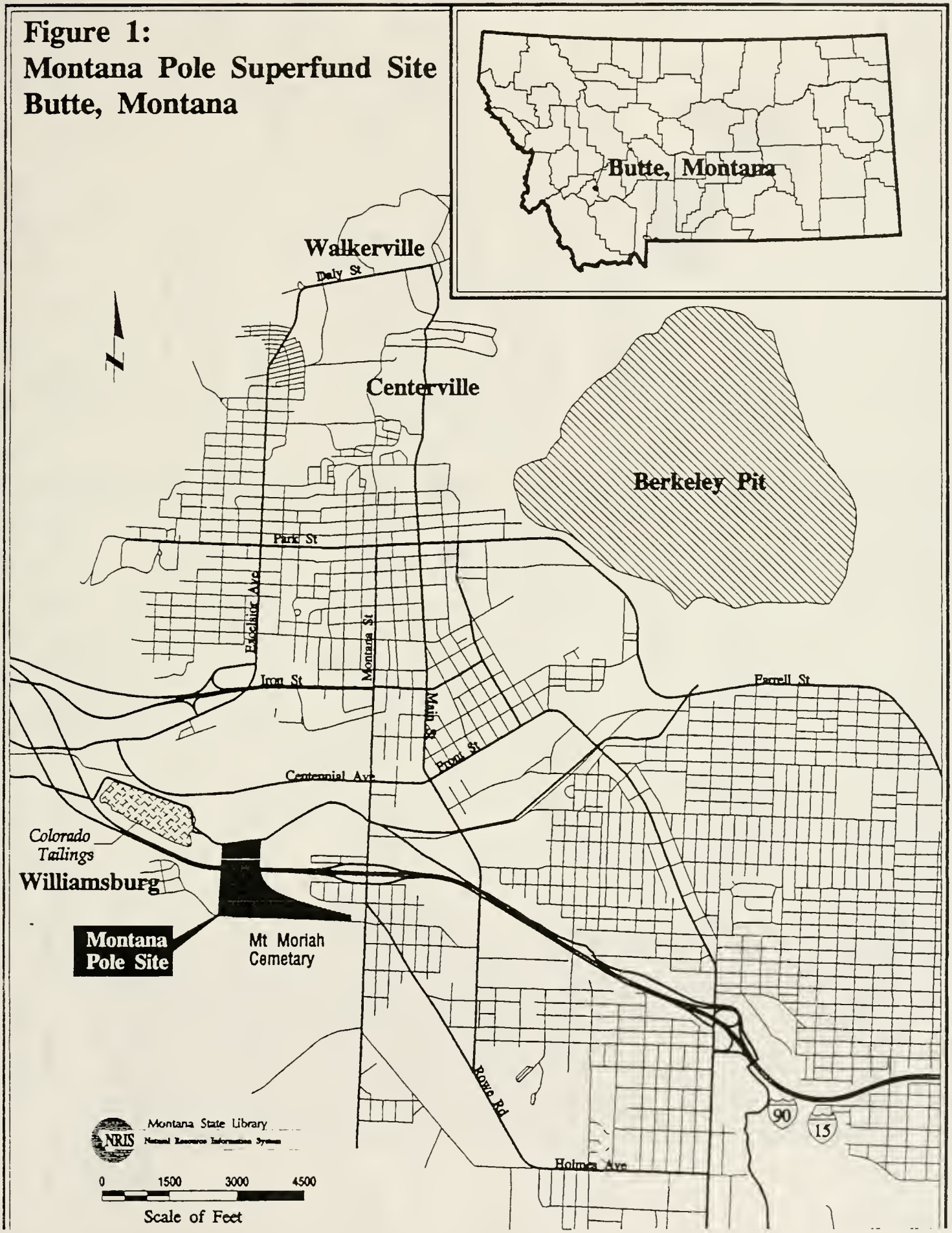

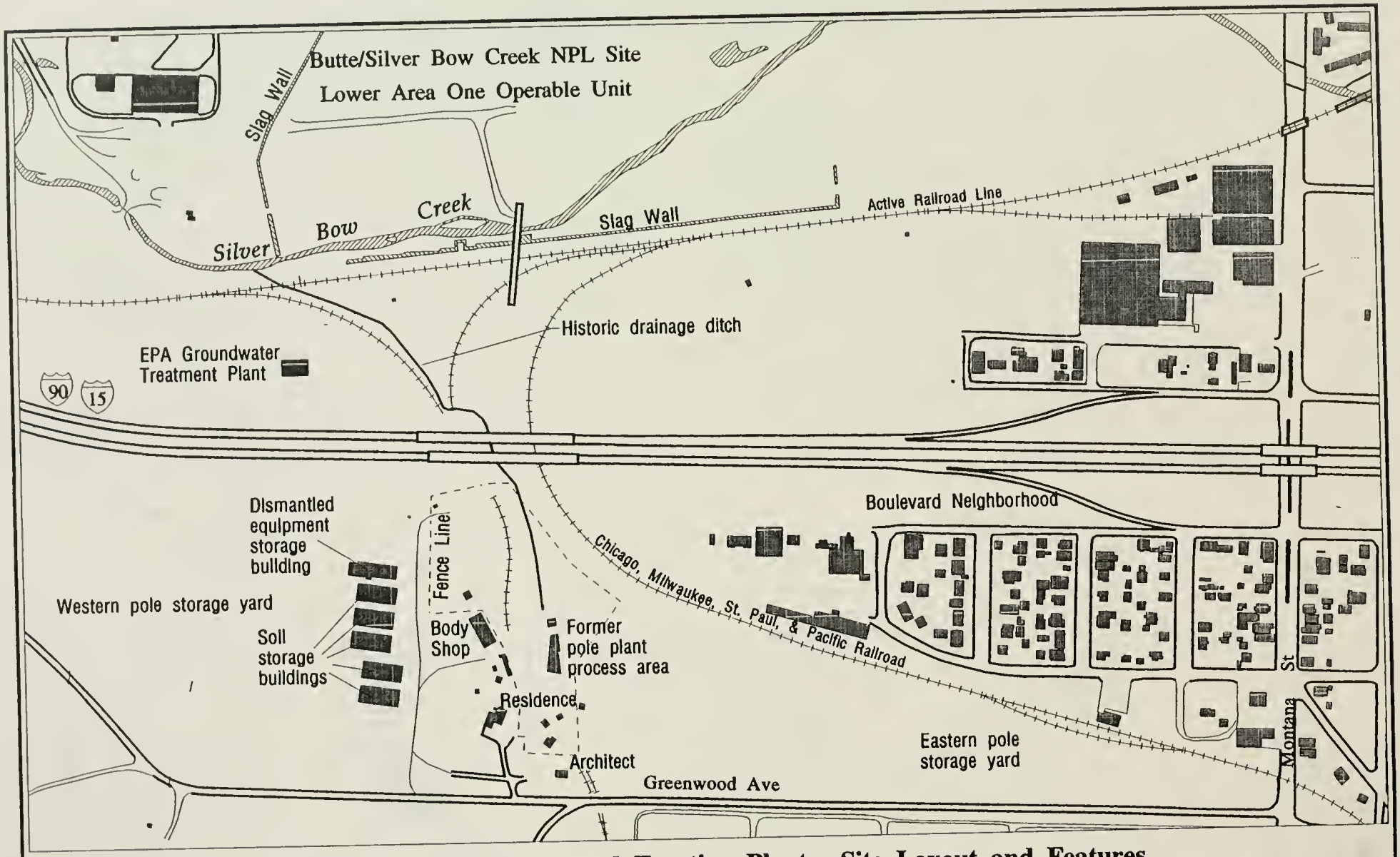

Figure 2: Montana Pole and Treating Plant. Site Layout and Features

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Public comments about this plan are encouraged and should be sent by September 15, 1993, to Superfund Information Officer Jane Heath at the above address.

Community Relations Plan

Overview

This community relations plan summarizes community concerns and outlines community relations activities to be conducted during the Superfund remedial design/remedial action and operation and maintenance activities at the Montana Pole Superfund site in Butte, Montana. This plan updates the 1989 plan for the site. The Montana Department of Health and Environmental Sciences (MDHES) has lead responsibility for managing the technical and community involvement activities and supervising site-related activities. MDHES is funded through a cooperative agreement grant with the U.S. Environmental Protection Agency (EPA). Montana Pole and Treating Company, Atlantic Richfield Company, Mr. Torger Oaas, and Burlington Northern Railroad have been designated by MDHES and EPA as potentially responsible parties for the site.

This plan was prepared in accordance with guidance found in "Community Relations in Superfund: A Handbook," by the Office of Emergency and Remedial Response, U.S. EPA, January 1992. The handbook spells out stipulations of the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (CERCLA), as amended by the Superfund Amendments and Reauthorization Act of 1986 (SARA), and as stipulated in the rules that interpret the Superfund legislation, the National Oil and Hazardous Substances Pollution Contingency Plan (NCP). The handbook states that "a community relations program should not try to quell controversy, but rather strive to anticipate, identify, and acknowledge areas of conflict so that decisions can be made with full understanding of community views."

The purpose of the community relations plan, as well as the entire community involvement program, is to identify the concerns of people affected by the site and develop methods to address those concerns. According to the State Superfund General Community Relations Plan and federal Superfund community relations guidance, the MDHES Solid and Hazardous Waste Bureau is required to conduct community interviews and, based on these interviews, to prepare a community relations plan that includes a description of the site background, history of community involvement at the site (including major community concerns), community involvement activities, a schedule of activities, and a list of contact people.

Community Interviews

Citizen interviews form the foundation for developing information to be disseminated to the public and for determining what actions are necessary to address public concerns. To develop this community

relations plan, MDHES conducted interviews with 23 Butte-area residents during 1992 including local and state government officials, site area residents, and members of the media. The interviews were conducted by the MDHES Superfund public information officer and site project manager.

Flexibility of the plan

This document only addresses concerns and issues up to its publication date. However, the plan is intended to be flexible enough that MDHES will be able to identify and address new issues as they arise.

Public perception

It is important to emphasize that the community relations plan presents the opinions and concerns of residents and other interviewees and not those of MDHES, EPA, or the potentially responsible parties (PRPs). The information derived from the interviews and summarized in the plan reflects interviewees' responses, regardless of their perspective or concerns. MDHES recognizes that personal feelings about the site and the Superfund program, regardless of their foundation, are an important part of community concerns which must be addressed.

Responding to public concerns is a vital function of MDHES at the site. The Superfund National Contingency Plan mandates response to all substantial comments made about the site feasibility study. Throughout the Superfund process, MDHES has and will continue to respond to all substantive questions and concerns.

In general, community concern about Superfund in Butte is high, but there is less public concern about the Montana Pole site than the Silver Bow Creek/Butte Area site. However, residents living in the immediate area of the Montana Pole site voiced a moderate to high level of concern. A variety of agencies and individuals are interested in the site. MDHES considers the concerns of these various groups throughout the jSuperfund process.

Capsule Site Description

History of operations

The Montana Pole and Treating Plant Superfund site is the location of a former wood-treating facility which operated from 1946 to 1984. During most of that time, the plant used pentachlorophenol (PCP) in a mixture with petroleum oil to preserve wood. For a brief period in 1969 creosote was used.

The plant was built in 1946 and pole treatment began in April 1947. A full line of wood products was treated at the plant, including utility power and transmission poles, bridge foundation pilings, planking, ties, timbers, and fence and guard rail posts.

Initial construction of the plant included a pole-peeling machine, two butt-treating vats, a boiler and other related equipment. The operation initially used only a butt-treating process and employed five to six workers.

In August 1951, a retort to pressure-treat the wood was installed, thus enhancing the quality of the treatment. A "retort" is a sealed, pressurized chamber used to treat timbers and poles. A second retort was added in 1958.

On May 5, 1969, there was a fire at Montana Pole. A watchman reported creosote (a wood preservative used at the plant for a short period of time) burning on the ground. The fire, fueled by both creosote and treated lumber, spread through buildings and seared a storage tank containing an estimated 10,000 gallons of heavy fuel oil, causing it to rupture and burst into flames. Before the fire was brought under control, much of the wood treatment equipment was severely damaged and several buildings were destroyed, along with a large quantity of lumber. It is unknown how much PCP and creosote were released to the environment in the fire; there was spillage from a butt-treating vat and both retorts.

The plant was rebuilt and back in operation by December that year. The remodeled facility did not use the butt-treatment process again after the fire. After the plant was back in operation, only PCP was used to treat the lumber.

By 1974, Montana Pole, including its logging operation, operated with approximately 25 employees in the slack season and 40 employees at peak operation during summer months. The company cut approximately 3.4 million board feet of lumber per year, most of which was taken from U.S. Forest Service land.

In 1976, Montana Pole acquired new wood-peeling equipment to virtually double the peeling capacity at the plant.

Montana Pole

In 1980, Montana Pole implemented a completely closed process water system on the site to eliminate the drainage of waste process water. The new process involved recycling of process water with the excess evaporated using aeration sprays.

Business at Montana Pole ceased in 1984 because of significant financial difficulties.

History of Superfund activities

Montana Pole was added to the National Priorities List of Superfund sites in November 1986. Located approximately 200 yards south of Silver Bow Creek, it is adjacent to the Silver Bow Creek/Butte Area Superfund site and is one of four sites that comprise the Clark Fork Basin group of Superfund sites. The source of contamination at the other three sites in the basin is primarily mining, milling and smelting wastes from more than 100 years of mining in the area.

In March 1983, a citizen complained about oil seeping into Silver Bow Creek. MDHES investigated the complaint and discovered an oil seep on the south side of the creek. A portion of the creek's bank was saturated with oil. It was determined the Montana Pole facility had discharged waste fluids from the pole treatment operation to a ditch adjacent to the plant. Oil staining was obvious on the upper portion of the ditch but decreased in the lower portion. On March 7, 1983, MDHES personnel observed and collected samples of oil discharging into Silver Bow Creek directly downgradient from the Montana Pole facility. During this time, wood treatment operations continued at the facility. MDHES collected samples of tank liquid, sludges, soil, surface water and groundwater were collected by MDHES in 1984-85, revealing PCP contamination. Dioxin also has been detected in soil and oil samples. PCP and dioxin are probable human carcinogens. MDHES and EPA completed the preliminary assessment, site investigation and subsequent hazard ranking score in July 1985.

The EPA Emergency Response Branch began conducting an emergency removal action at the site in July 1985 to stop seepage into Silver Bow Creek, collect oil and contaminants from groundwater, excavate and store highly contaminated soils, and generally stabilize the site. EPA installed a groundwater interception and oil recovery system to collect oily wood-treating fluid floating on top of the groundwater. This system remains in operation today. The recovered oil is stored on-site in above-ground tanks.

In March 1988 EPA and MDHES entered into a cooperative agreement to allow MDHES to develop a statement of work and conduct a state-lead remedial investigation and feasibility study (RI/FS) at the Montana Pole

site. The agreement also provided funding to MDHES to administer post-removal site control activities including operation and maintenance of the groundwater interception and oil recovery systems. MDHES published a draft work plan for the site to provide specific guidance for the RI/FS process.

In June 1988 EPA converted Montana Pole to an "enforcement-lead" site. (Under Superfund law, EPA must offer the potentially responsible parties the opportunity to conduct the remedial investigation and feasibility study. "Enforcement lead" indicates the responsible parties are conducting activities at the site with MDHES oversight.) In August 1989 EPA granted MDHES funding for potentially responsible party noticing and administrative order negotiations and issuance. In April 1990 MDHES signed an administrative order on consent with the Atlantic Richfield Company (ARCO) to conduct the RI/FS. MDHES was subsequently granted additional funding from EPA to act as lead agency for RI/FS oversight and administrative and judicial enforcement during the RI/FS.

From June 1990 through July 1991, ARCO conducted activities specified in the RI/FS work plan. These tasks consisted of sampling soils, groundwater, aquifer properties, sediment, surface water, removed soils, sludges and oils, separator water, miscellaneous equipment and ambient (outdoor) air. Sampling results were presented in a draft remedial investigation report issued by ARCO to MDHES for review in July 1992. RI results indicate significant contamination in site soils and groundwater. Highly contaminated areas of site soils include the former plant process area, the historic drainage ditch running from the process area to Silver Bow Creek, and a subsurface region contaminated by a layer of oily wood-treating fluid which is floating on top of the groundwater and has migrated from the former process area downgradient to Silver Bow Creek. Contamination was also found in Silver Bow Creek surface water and sediments.

MDHES conducted a human health and environmental risk assessment for the site and published the Baseline Risk Assessment Report in August 1992. This report concluded that site contaminants could pose significant health risks to people exposed to site soils and contaminated groundwater. In terms of environmental risk, although mining-related contamination presently limits aquatic life in Silver Bow Creek, organic contaminants from Montana Pole could limit future aquatic recovery if the site isn't remediated.

In summer 1992, EPA began conducting additional emergency removal actions at the site. These activities included installation of extraction wells to recover oil floating on the groundwater. Groundwater recovered by this system will be treated in an on-site water treatment

plant and discharged to Silver Bow Creek. Oils recovered by the system will be stored on-site pending site cleanup.

In May 1993, MDHES released the feasibility study and proposed plan which presents and evaluates alternatives for cleaning up the site. The public comment period ended July 7, 1993. A record of decision is expected later in 1993. This community relations plan outlines activities to be conducted during the post-RI/FS period.

Community Background

Community profile

From the early 1870s to the late 1970s, Butte was one of the world's most productive mining districts because of rich copper deposits under the city and surrounding area. The Butte Hill has been called "the richest hill on earth," and at one time the Berkeley Pit at the edge of Butte was the largest open pit mine in the world. In addition to the open pit mines, it is estimated there are more than 3,500 miles of mining tunnels under the city.

From the late 1800s to the early 1900s, seventeen active smelters and more than 300 different mines operated in the area. After the Anaconda Smelter was constructed, all smelting took place in Anaconda. The builder of this smelter, the Anaconda Company, eventually emerged as the major employer in the area and a major mining company in the country.

Butte was a large town during the height of mining activity at the turn of the century with a population of approximately 150,000 at one point. Digging of the Berkeley Pit began in the section of town once known as Meaderville. The pit was in operation until 1982 when all mining was shut down, putting approximately 1,000 people out of work.

Butte entered a period of economic decline as a result of the shutdown. Today, a strong coalition of local government officials and business people is working to restore Butte's economy with an active push to revitalize the downtown district. Major Butte employers include Montana Tech, Montana Power Company, Montana Resources Inc. and National Center for Appropriate Technology.

Two neighborhoods lie near the site -- the Boulevard to the northeast and Williamsburg to the west. When asked to describe their neighborhoods, residents said there is an even mix of adults and children. Many of the Boulevard-area residents are involved in the neighborhood volunteer fire department. The Boulevard neighbors got together in the 1980s to make a park from private land. The park is well-kept and used

by the children. Williamsburg residents tend to live there a long time. Some own horses. One Boulevard resident pointed out the Williamsburg residents feel especially affected by the site because they drive by it every day.

OVERVIEW OF COMMUNITY RELATIONS AT THE SITE

EPA's Emergency Response Branch conducted community relations activities at the Montana Pole site during the initial removal phase. The public did not show a great deal of interest in early site activities.

Throughout the remedial investigation process at the site, MDHES has seen community concern rise. The ultimate fate of the site, use of the land and health are the issues of most concern.

Community's level of understanding about the site

Most interviewees said their understanding of site issues was low and that the public needs a better understanding of the Superfund process. However, one woman said people understand as much about the process as they care to learn. They added that the public is not sure what kinds of timbers were treated there or the type of treatment. The reasons for shutdown of the plant are not clear to the interviewees.

Interviewees did say the community understands what the contamination is and why it's a Superfund site. One interviewee pointed out that Superfund issues are difficult to put in lay terms.

Issues of local interest

Although Superfund is a big issue in Butte, it's certainly not the only thing concerning the residents. The economy was mentioned by all interviewees. There is concern that copper prices will drop and Montana Resources Inc. will shut down its Butte mining operations. Montana Power Company (MPC) and Rhone Poulenc (formerly Stouffer Chemical) are important to the community's economy. An interviewee said there is always talk that MPC will leave Butte, and locals are concerned about Rhone Poulenc's stability.

Other issues of concern included: Butte Water Company, Berkeley Pit flooding, education, and state tax reform.

Site issues which may be confusing to the public

Many interviewees said they are confused about the difference between MDHES and EPA. There is apparently a lack of understanding about why site soil is being stored on-site and what will ultimately happen to it.

Risk assessment issues also cause some confusion, especially exposure routes and health effects.

Environmental concern level in Butte

Environmental consciousness is apparently rising. People are becoming more aware of aesthetic aspects of the environment because it makes a difference to the economy and to public pride. One interviewee said local government is taking a stronger position on environmental issues. Some people see environmental cleanup as a growth industry translating to more jobs and a better local economy.

Most interviewees said the people of Butte see environment and economy as issues which must be balanced. For some residents, Superfund is a burden, not an ultimate benefit. Some see environmental issues and the economy as polar opposites.

Several interviewees said environmental concern varies depending upon the resident's age. People over 50 tend to be less concerned about environmental issues, and school children are the most concerned.

One person said Butte created its own environmental problems, and now the community is angry at the government for environmental regulation. Another interviewee said environmental concern does not always equal environmental awareness or education.

Attitudes toward involved agencies and potentially responsible parties

Interviewees were asked their feelings about EPA, MDHES and the potentially responsible parties. MDHES staff prefaced this question by saying MDHES would like to know both positive and negative feelings. Overall, answers tended to contain a central theme about the stake these agencies hold in Montana's future.

1) EPA

One interviewee said although EPA in Helena employs lots of nice people, they probably won't be staying in Montana forever and therefore have less stake in the outcome of the site.

Comments from interviewees ranged from saying EPA had been extremely helpful to one person who expressed strongly negative feelings about EPA's administration. However, all interviewees said they liked the EPA project staff.

2) MDHES:

Few interviewees were able to draw a clear distinction between MDHES and EPA, but those who were able to do so said MDHES project staff had been helpful and dedicated and that they were more inclined to believe MDHES than EPA. Similar to the feelings about EPA, some interviewees did not trust the state's administration and believe it isn't concerned enough about the environment. One interviewee said MDHES should be more involved in Superfund because MDHES has more at stake.

3) Potentially responsible parties:

All of the interviewees who mentioned Torger Oaas said they like him and that he has been a good neighbor and supportive of community activities. They said he was not blameless but was acting within the laws of the times.

Most people expressed neutral to negative feelings about ARCO and said the company is responsible and owes it to Butte to clean up the site. They pointed out that ARCO made a profit from Butte, now they need to make it safer. Most interviewees were skeptical about what ARCO says because they have an "interest to protect." One interviewee countered that sentiment and said ARCO has moved some dirt. When ARCO speaks at a public meeting, the agenda and discussion become suspect, one person said. As with feelings about EPA and MDHES, several people said they like ARCO's Montana project staff but distrust the company and its administrators. Some interviewees said ARCO has little at stake in Montana and wants to get out of Montana as quickly and cheaply as possible. One interviewee pointed out that, nationally, ARCO isn't in the remediation business.

Following is a list of the concerns expressed during the interviews:

<u>Key community concerns:</u>

1) Effects of site contamination on public health

This category includes a number of concerns such as potential health effects on Boulevard neighborhood residents from odors when the plant was in operation. One man expressed concern about dirt taken from the site and hauled to use in residential yards. One family living near the site said they were concerned about health effects today caused by playing on the site when they were children. Some interviewees said most people know to keep their children off the site. Another concern was length of toxicity and breakdown of contamination. Several people mentioned they are concerned that health risks for the site will be compared to health

risks for the rest of the nation when the issue is what should be acceptable in Montana.

Concerns were also expressed about potential airborne contamination from the site.

2) Effects of site conditions on the environment

Most interviewees expressed little concern about contamination in groundwater because it isn't a source of drinking water. However, the health of Silver Bow Creek was of concern because of effects on Clark Fork fisheries and downstream drinking water quality. The possibility of Grove Creek (which since has been rerouted) flooding through the site was another concern. A noxious plant called knapweed is a problem, according to a Boulevard resident, who explained that neighborhood yards are reinfected with knapweed each year because of the site. Eutrophication (resulting in the loss of oxygen) of Silver Bow Creek was another environmental concern, but one which is probably not related to contamination from the Montana Pole site.

3) Coordination of Montana Pole site activities with other Superfund sites

Several interviewees said they want activities at the site closely coordinated with the Colorado Tailings activities and other Butte operable units even if it takes longer.

4) Site appearance

Several interviewees said they dislike the way the site looks. One interviewee said the "cosmetics of the cleanup are a wreck." This person added that the removal work should have looked a lot better.

5) Length of the Superfund process

Eight people interviewed expressed concern about this issue. A closely related concern was that MDHES not allow legal issues to delay cleanup. Two interviewees said they are worried the site will become an endless court battle and not be cleaned up. An interviewee explained that protracted activities cause the community to adopt a jaded view and make it tough for the agency to keep concern and interest up.

6) The effects of the site on the community

Socioeconomic impacts to the community were mentioned by a number of interviewees. One person explained that even though the community's economy isn't usually a Superfund consideration in cleanup decisions, one of the nine criteria is the money spent on cleanup, presumably by the potentially responsible parties. This is extremely

frustrating to the community and makes them feel unimportant because the impacts on them aren't considered while the impacts on the PRPs are. Institutional controls and contamination left on-site also fell into the category of effects on the site community. Local government officials said they want meaningful involvement in determining the use of institutional controls as part of site remediation.

7) Concern about true public involvement

Because there were communication problems between EPA and the public regarding the Colorado Smelter cleanup adjacent to the Montana Pole site, there was concern voiced that MDHES would repeat the mistake. Several interviewees warned MDHES this should not be allowed to happen again, and that they wanted to be notified of all site activities before they begin, and more importantly, to have a voice in how activities are conducted.

8) Future use of the site

When asked to what use the site should be put after remedy, interviewees offered varying responses ranging from residential to commercial to light industrial. None mentioned heavy industrial. Many interviewees suggested a green space (park) or wetlands, somehow returning the site to its natural state. The reclamation of Silver Bow Creek was a common theme; people want it to be a resource, not a problem.

Some expressed fear that local government will zone the site area for industrial use so that cleanup won't be as stringent as if it were zoned residential. Four interviewees stressed they don't want to see contaminated material stored forever at the site. A nearby resident southwest of the plant said people in their neighborhood are strongly concerned about future use, and that people in the area are no longer as tolerant of heavy industry. The interviewees all agreed they want the looks of the site improved so that it helps create a better first impression of Butte for visitors (due to its proximity to U.S. Interstate 15/90).

9) Selected site remedy

The interviewees were specifically asked if incineration would be an acceptable option. The majority said "maybe" with the following types of conditions: a) only if it's proven safe to public health because Butte already has enough air pollution, b) as long as no outside wastes were burned, c) as long as it's hot enough to completely destroy the wastes, d) if it's only temporary, until the site is remediated, e) if clean burning fuels are used, and f) as long as it's not operated during inversions.

A few interviewees were adamantly against incineration. They said it will "create a hornet's nest." They pointed out that local wood stove

owners are closely regulated and that those people would be irate about incineration. One interviewee pointed out that the question of medical waste incineration went over very poorly in Butte.

Highlights of the Program

The following is a list of MDHES and EPA objectives for the Montana Pole site, based on the interviews:

1) Be aware of and respond to public sentiment throughout the Superfund process at the Montana Pole site. While not all concerns can be addressed or remedied, MDHES will remain sensitive to all issues and will endeavor to respond accordingly.

2) Be aware of the changing information needs of the public and be flexible in responding to those changes. MDHES will be willing to find new ways to work with the public.

3) Make sure local governmental officials are kept up-to-date and are encouraged to be actively involved in Superfund activities at the Montana Pole site.

4) Be available to the public and respond quickly to their questions and concerns.

5) Keep the lines of communication open between MDHES, EPA and any other involved agencies.

Techniques and Timing

Techniques for involving the public in site issues and decisions will vary widely to accommodate as many members of the public as possible. When asked how they get their information about Superfund, the answers ranged from television to radio to newspapers to newsletters to word of mouth to the site owner to the agencies involved.

The following activities will be used in conducting community involvement activities at the site:

1) Public meetings

Public meetings will be held during public comment periods, when important study information is released, and at the request of citizens. MDHES will conduct meetings to update the public about the remedial design/remedial action and remediation work. Meetings will also help MDHES gain public input about site activities.

The meeting format will be tailored to encourage audience participation such as breaking into small discussion groups. Speakers will be encouraged to explain events and findings in lay terms and to use visual aids.

MDHES encourages local citizens to participate in the meetings, suggest who will speak and when the meetings will be held. Meetings will be held in central locations, preferably during evening hours, on dates convenient for the public, i.e., not during other large public events, on weekends or holidays. When appropriate, MDHES may make arrangements for the speaker to meet in a less formal setting with community members before or after the meeting. MDHES may ask the potentially responsible parties to participate in these meetings by presenting findings of their investigations, etc.

MDHES publicizes meetings by placing ads and press releases in local newspapers and on local radio stations. Other publicity often includes small flyers posted in public areas, postcards sent to the site mailing list, and information printed in the MDHES site progress reports.

The meetings should be held, if possible, at the Boulevard Fire Hall. The hall can be reserved by calling Bill Fisher Jr. The fire hall holds 40 to 50 people. The best meeting time is 7 p.m. and the best days of the week are Wednesday or Thursday. Meetings may also be held at the county health department conference room or the senior citizens center.

During interviews, the following suggestions were made about public meetings:

- Try to get away from the perception that it's just another government meeting and show the public how their input is important.
- Make the meetings more informal.
- Ask the people attending what they want. Try to get everyone in the room to say something.
- Have several meetings at different times on different days to appeal to and draw in a wider, larger audience.
- Lunch meetings are very effective.
- Break into small groups for discussion of the issues, then have each group report back. Agency and ARCO staff members would not be allowed to bring up their own ideas. Brainstorm the ideas, then rank them. If someone in the small group asks a question, ask it back to the group.
- Explain how the agencies arrive at decisions.
- Hold sack lunch forums at Emma Park, Butte High, Business Incubator, or the Council Chambers.

2) Document repositories

Site documents and other information have been, and will continue to be, made available to the public near the site. MDHES has established repositories of site documents for check-out at the Butte-Silver Bow Public Library, the Montana Tech Library in Butte, the Montana State University Renne Library, EPA's Butte office, the State Library and MDHES offices in Helena. MDHES sends documents to the repositories as quickly as possible after publication.

3) Continue to work with the site citizens group

In 1992, the Citizens Technical Environmental Committee (CTEC) was awarded an EPA technical assistance grant for the Montana Pole site. MDHES attends and participates in monthly CTEC meetings and stays in phone contact between meetings. MDHES will continue to keep the group informed about current site investigations and the screening of potential cleanup methods and will try to receive input about these issues. MDHES will attend citizen group meetings, when invited, to answer questions about the site or make presentations.

4) Press releases

Press releases are used for information such as meeting announcements, new data and site projects. Press releases are prepared by the MDHES Superfund public information officer and reviewed by the project manager and departmental management for approval prior to release. Press releases are written in Associated Press style, inverted pyramid fashion (most important information first) and double-spaced. When applicable, at the end of the release, a note is added requesting that meeting information be included also in the community calendar. Each press release will contain the names and phone numbers of MDHES personnel to contact for further information.

5) Public service announcements

Public service announcements (PSAs) may accompany press releases and are sent to radio and television stations. PSAs are used for meeting notices, workshops, the toll-free Superfund phone hotline (1-800-648-8465), etc.

6) Press contact list

MDHES maintains and regularly updates a press contact list for the site. The list includes all press contacts in the Butte area. (Please refer to the list at the end of this document.)

7) Progress reports

MDHES publishes progress reports in which information is broken down into short, readable sections or "articles." The progress reports contain information on recently released documents, upcoming meetings, site activities, completion of projects, sampling results, etc. Progress reports should contain easy-to-read maps to help explain site activities.

Progress reports are sent to those on the site mailing list. Extra copies are distributed to pamphlet racks in Butte, a number of public agencies and other locations deemed appropriate. MDHES keeps extra copies of progress reports on file to distribute at public meetings and in the future to serve as site background information.

8) Access to private property for sampling activities

When MDHES staff needs to take samples or conduct remediation activities on private property, they will generally coordinate access with the property owner in advance. When possible, the Superfund public information officer or site project manager will contact the residents and/or owners in person, explain what will be taking place, and ask the property owner to sign a permission form. The permission form, while a legal document, should be written clearly and concisely enough so the owner can read it and sign it in the presence of the Superfund information officer or site project manager. Furthermore, the owner should be able to feel comfortable about the contents of the permission form.

The Superfund information officer or site project manager will make every effort to ensure that workers arrive only at times convenient for the owner. They will then provide copies of the permission forms, resident contact sheets, any necessary maps, and special instructions or requests to the personnel doing the sampling. Depending on the complexity of the activities and the knowledge of the residents, MDHES may provide the residents with fact sheets. Residents will be given results in easy-to-understand language in addition to the technical data.

9) Educate the public about participation in site decisions

MDHES will continue to include information in progress reports describing upcoming community involvement activities and public comment periods. This includes the names, locations, and hours of the information repositories, as well as the names, addresses, and phone numbers of EPA and MDHES personnel to contact with specific questions. It also includes general information about the Superfund process and public comment provisions. Agency personnel should always carry a supply of business cards and progress reports to be handed out when conducting on-site activities.

10) Continue to remind the public of the toll-free hotline

The MDHES Superfund in-state toll-free number, or "hotline," was established in June 1987 and has proven an effective tool for the public as well as MDHES. The public may be more hesitant to call government offices when they know they will have to pay long-distance charges. The hotline eliminates this hesitancy. The hotline is in operation during business hours at MDHES, and an answering machine takes messages in the evenings and on weekends. The number is 1-800-648-8465.

11) Make the administrative record file available to the public

The public may wish to look at open file information. This information will be made available in the form of an administrative record for the site. Copies of the administrative record are housed at both the Montana Tech Library and the MDHES Helena Office. The administrative record contains documents upon which the site remedy selection is based, as required by CERCLA §113(k). Other MDHES site records are open to the public. Requests to review them are directed to the Superfund docket clerk and/or the site project officer.

12) Maintain and update the mailing list

At MDHES, the site mailing list is kept on computer files and is updated regularly. MDHES actively solicits additions to the mailing list in the progress report and at public meetings. Actual maintenance and updating is coordinated by the MDHES Superfund public information officer.

13) Press meetings

In addition to regular dialogue with the media, meetings with the press are especially helpful when MDHES staff has complex or extensive information they would like to convey to the community. These meetings usually are held in the daytime before evening public meetings. In these press meetings, the project manager can give the reporters a brief rundown of what will be presented at the public meeting. The advantages of this approach include: a) reporters have ample opportunity to ask questions and clarify points; b) taking time with the press shows them we are interested in them and in their story; c) these meetings help reporters who aren't as familiar with site issues catch up on more basic points; d) in these meetings, MDHES personnel and the reporters have a chance for better one-on-one discussion.

14) One-on-one contact with the public

Although public meetings are effective, they can be impersonal. One-on-one contact has been and will continue to be a vital component

of MDHES's community involvement work. For instance, MDHES will continue to be involved in arranging meetings with city/county leaders, public interest groups, Congressional aides, state legislators, and so on. The Superfund public information officer will also deal one-on-one with members of the community. Community groups such as Optimist, Kiwanis, Chamber of Commerce, League of Women Voters, Rotary, etc., are encouraged to contact the Superfund public information officer to arrange speakers for their group meetings. MDHES has been encouraged by interviewees to hold more small group meetings with city and county officials.

15) Notify the Boulevard and Williamsburg neighborhoods of site activities

MDHES will notify site neighbors of meetings and major site activities by direct mailing. This will include postcards about public meetings and comment periods and letters or progress reports about site cleanup activities.

Newsletters are an effective information dissemination activity for the Williamsburg area. A Williamsburg resident explained people there tend not to go to public meetings, and the newspaper has difficulty retaining news carriers for the area. Thus, few people in that neighborhood get the newspaper.

MDHES may also use flyers distributed door-to-door to notify site neighbors of workshops and meetings.

16) Maintain central public information contacts

The site project manager and the Superfund public information officer are the first-line contact people for the public in most cases. When these staff members are unavailable, calls and visits will be directed to the Superfund program supervisor.

17) Site tours

Public site tours are a good method to help the public learn more about site problems. Public site tours should be held on weekends. Butte members of the press said they would like more site tours by MDHES. For press tours, Monday through Thursday morning is best. Friday is not a good day for site tours.

ATTACHMENT A -- ACTIVITIES SCHEDULE

Community involvement activities timing

Community Involvement Activity	Release of Record of Decision	Negotiations with responsible parties	Beginning of RD/RA	Operation and Maintenance
Public meeting	X		X	X
Press releases	X	X	X	X
Public service announcements	X	X	X	X
Progress report	X	X	X	X
Press meeting	X	X	X	X
Notify nearby neighbors of site activities	X	X	X	X
Site tours			X	

Day -to-day community involvement activities which are on-going throughout the process are not listed above.
Please refer to the community relations activities section for descriptions of these activities.

Attachment B -- Contact list

Montana Department of Health and Environmental Sciences
- Director Bob Robinson
- Superfund supervisor Dick Pedersen
- Superfund coordinator Karen Zackheim
- Site project manager Brian Antonioli
- Superfund public information officer Jane Heath

Cogswell Building
P.O. Box 200901
Helena, Montana 59620
406-449-4067 or 1-800-648-8465

EPA, Helena Office
- Director John Wardell
- Superfund branch chief Don Pizzini
- Remedial project manager Sara Weinstock
- Community relations officer Pam Hillery

U.S. EPA
Federal Building, Drawer 10096
301 South Park
Helena, MT 59626
406-449-5414

Butte/Silver Bow Local Government Officials
Chief Executive Jack Lynch
155 West Granite
Butte, MT 59701
723-8262

Planning Director Jon Sesso
155 West Granite
Butte, MT 59701
723-8262

Health Department Director Dan Dennehy
25 West Front St.
Butte, MT 59701
723-3275

ATTACHMENT C -- MEDIA LIST

Agri News
P.O. Box 30755
Billings, MT 59107-

Western Livestock Reporter
P.O. Box 30758
Billings, MT 59107-

Farm And Ranch Forum
P.O. Box 36300
Billings, MT 59107-6300

Bob Anez
Associated Press
1300 Cedar
Helena, MT 59601-

Bob Roberts
KQUY-95 and 1370 KXTL Radio
3219 Harrison
Butte, MT 59701-

Butte/Silverbow Health Dept.
25 West Front
Butte, MT 59701-

Chief Executive
Butte/Silverbow Courthouse
Butte, MT 59701-

KTVM-TV
P.O. Box 3118
Butte, MT 59701-

Jay Kohn
KXLF-TV
P.O. Box 3500
Butte, MT 59702

Karen Sullivan
KBOW and KOPR Radio
P.O. Box 3389
Butte, MT 59702-

Montana Standard
P.O. Box 627
Butte, MT 59703-

Bruce Farling
High Country News
P.O. Box 7186
Missoula, MT 59807-

Sally Mauk
KUFM Radio
University Of Montana
Missoula, MT 59812-

Karen Atkinson
Waste Tech News
131 Madison
Denver, CO 80206-

Carol Evans
Environmental Hotline
7208 Jefferson N.E.
Albuquerque, NM 87109-

Montana Farmer Stockman
P.O. Box 2160
Spokane, WA 99210

ATTACHMENT D -- REPOSITORIES, MEETING HALLS

DOCUMENT REPOSITORIES

Montana Tech Library
West Park Street
Butte, MT 59701
HOURS: Monday-Thursday: 8 a.m. to 11 p.m.
Friday: 8 a.m. to 5 p.m.
Saturday: 9 a.m. to 5 p.m.
Sunday 1 p.m. to 11 p.m.

Butte-Silver Bow Public Library
226 West Broadway
Butte, MT 59701
723-3361
HOURS: Monday: 9 a.m. to 5 p.m.
Tuesday, Wednesday: 12 p.m. to 8 p.m.
Thursday through Saturday: 9 a.m. to 5 p.m.
Closed Sunday

Montana State Library
1515 East Sixth Avenue
Helena, MT 59620
HOURS: Monday through Friday: 8 a.m. to 5 p.m.

Superfund Office
Montana Department of Health and Environmental Sciences
616 Helena Ave., Room 302
Helena, MT 59620
HOURS: Monday through Friday: 8 a.m. to 5 p.m.

PUBLIC MEETING HALLS

Boulevard Fire Hall
Bill Fisher, Sr. (fee: $50)
Corner of LaSalle and Franklin
Butte, MT 59701
723-4290

Butte/Silver Bow Health Department Conference Room
Dan Powers
25 West Front Street
Butte, MT 59701
723-3275